

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

This Document Relates to Plaintiff Sam

Clark and Sophie Clark, 2:18-cv-00850-DGC

**PLAINTIFF'S UNOPPOSED MOTION TO TERMINATE PARTY  
AND AMEND THE COMPLAINT**

Plaintiff Sam Clark, by and through undersigned counsel, and pursuant to FRCP 25(a) and 15(a)(2) hereby move the Court to terminate Sophie Clark, as Plaintiff by way of an Amended Short Form Complaint in the form attached hereto as Exhibit 1, and in support, states as follows:

1. Plaintiff Sam Clark was implanted with a Bard IVC Filter and subsequently discovered injuries in 2017. Plaintiff retained undersigned counsel, who filed a Complaint on his behalf against the Defendants for Plaintiff's IVC Filter-related injuries.
2. This case is part of a settlement with Bard.
3. Plaintiff's spouse, Sophie Clark was also named as a plaintiff in this action for damages, including loss of consortium.
4. Sophie Clark unexpectedly passed away April 28, 2018.
5. Plaintiff hereby submits an Amended Short Form Complaint, attached hereto as Exhibit 1, which terminates Sophie Clark as Plaintiff, along with any claims for

1                   damages associated with Sophie Clark.

2         6. The death certificate of Sophie Clark is attached as Exhibit A to the Amended  
3                   Short Form Complaint.

4         7. Counsel for Defendants has indicated that they have no objection to this motion.

5                   WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff's Unopposed  
6                   Motion to Terminate Party and Amend the Complaint and order the Clerk to file the  
7                   Amended Short Form Complaint, attached hereto as Exhibit 1.

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11                   DATED: 09/21/2020

Respectfully Submitted,

12                   /s/ Stuart L. Goldenberg  
13                   Stuart L. Goldenberg (*pro hac vice*)  
14                   Marlene J. Goldenberg (*pro hac vice*)  
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Atorneys for Plaintiffs